NORTH CAROLINA DIVISION OF AIR QUALITY

Application Review

Issue Date:

Region: Winston-Salem Regional Office
County: Guilford
NC Facility ID: 4100868
Inspector's Name: Andrew Kormos
Date of Last Inspection: 07/14/2020
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): The Sherwin-Williams Company - Stage Coach Trail

Facility Address:
The Sherwin-Williams Company - Stage Coach Trail
113 Stage Coach Trail
Greensboro, NC 27409

SIC: 2851 / Paints and Allied Products
NAICS: 32551 / Paint and Coating Manufacturing

Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 02D .0515, .0521, .1806
NSPS: NA
NESHAP: 02Q .0317 MACT Avoidance
02D .1111 (GACT CCCCCCC)
PSD: NA
PSD Avoidance: NA
NC Toxics: 02D .1100 and 02Q .0711
112(r): NA
Other: NA

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Nicole Sweet EHS Manager (336) 550-1624 113 Stage Coach Trail Greensboro, NC 27409	Jon Latimer Plant Operations Manager (336) 550-1610 113 Stage Coach Trail Greensboro, NC 27409	Nicole Sweet EHS Manager (336) 550-1624 113 Stage Coach Trail Greensboro, NC 27409

Application Data

Application Number: 4100868.19A, 4100868.19B, 4100868.20A,4100868.20B
Date Received: 08/31/2020
Application Type: Renewal, Two 502(b)(10). Modifications and Minor Modification
Application Schedule: TV-Renewal

Existing Permit Data
Existing Permit Number: 05755/T21
Existing Permit Issue Date: 02/02/2018
Existing Permit Expiration Date: 05/31/2021

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2018	---	0.5600	106.85	0.4700	0.7500	15.54	5.55 [Toluene]
2017	---	0.5400	99.89	0.4500	0.9700	13.95	5.77 [Toluene]
2016	---	0.6500	97.90	0.5500	0.6900	14.46	5.80 [Toluene]
2015	---	0.4200	97.81	0.3500	0.6600	14.24	5.63 [Toluene]
2014	---	0.5600	78.23	0.4700	0.5300	11.67	4.49 [Toluene]

Review Engineer: Eric Crump

Review Engineer's Signature: **Date:**

Comments / Recommendations:
Issue 05755/T22
Permit Issue Date:
Permit Expiration Date:

1. Purpose of Application

The Sherwin-Williams Company - Stage Coach Trail (hereafter referred to as Sherwin-Williams) is a paint and coating manufacturing facility located in Greensboro, Guilford County, North Carolina. The facility operates under Title V Permit No. 05755T21 with an expiration date of May 31, 2021. Through permit application No. 4100868.20A, Sherwin-Williams has applied for renewal of their facility's air quality permit. The renewal application was received on August 31, 2020, or at least six months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

In addition to the permit renewal, Sherwin-Williams has requested two 502(b)(10) permit modifications in accordance with 15A NCAC 02D .0523(a)(1). These changes are listed below, and will be incorporated into the permit renewal:

- No. 4100868.19A, addition of two 500-gallon portable mix tanks (ID Nos. PM 507 and PM509)
- No. 4100868.19B, addition of bulk tank truck filling (ID No. FFLbulk)

Also, in a letter dated August 27, 2020, Sherwin-Williams submitted an application (No. 4100868.20B) to add one 2,000-gallon blending tank for the manufacture of UV coatings (ID No. UVT5) as a minor modification of their permit.

2. Facility Description

The Sherwin-Williams facility manufactures paint, lacquer, varnish, and other coatings. The products made at this facility are mostly for customers in the commercial market, such as cabinet manufacturers and flooring companies. The facility operates 24 hours per day, five days a week for 50 weeks per year, with occasional overtime shifts on Saturdays. Maintenance is also occasionally scheduled on Saturdays.

The facility's main building houses the manufacturing, shipping, and receiving operations, resin storage tanks, and quality control laboratories. A second building, known as the wood lab, is primarily used for research and development. An outside tank farm provides storage for solvents.

3. Application Chronology

June 21, 2016	Division of Air Quality (DAQ) issues Permit No. 05755T19 to Sherwin-Williams as a combined Title V renewal and minor modification.
August 16, 2016	Taylor Hartsfield, Winston-Salem Regional Office (WSRO) conducts facility compliance inspection. The Sherwin-Williams facility appeared to be operating in compliance with all permit requirements.
September 28, 2016	DAQ receives permit application from Sherwin-Williams for a minor modification to replace an existing cartridge-type bagfilter (ID No. CD1) with 6,000 square feet of filter area, with a larger cartridge-type bagfilter having 10,160 square feet of filter area.
November 22, 2016	DAQ issues Permit No. 05755T20 to Sherwin-Williams for the aforementioned minor modification.

December 5, 2016	Letter from R. Stewart, WSRO Compliance Supervisor to J. Kelley, Area Director Operations, Sherwin-Williams stating the report for the visible emissions test conducted November 1, 2016 for the cartridge-type bagfilter has been reviewed and found acceptable. The test results showed compliance with permit requirements.
August 1, 2017	Taylor Hartsfield, WSRO conducts facility compliance inspection. The Sherwin-Williams facility appeared to be operating in compliance with all permit requirements.
January 12, 2018	DAQ receives air permit application (4100868.18A) from Sherwin-Williams for an ownership change from "The Sherwin-Williams Manufacturing Company" to "The Sherwin-Williams Company.".
February 2, 2018	DAQ issues Permit No. 05755T21 to Sherwin-Williams for the aforementioned ownership change.
February 20, 2018	DAQ receives letter from P. Turner, Environmental Health and Safety Coordinator, Sherwin-Williams designating Jon L. Latimore as the new facility authorized contact, replacing James Kelley.
June 6, 2018	Taylor Hartsfield, WSRO conducts facility compliance inspection. The Sherwin-Williams facility appeared to be operating in compliance with all permit requirements.
March 14, 2019	Shannon Leonard and Taylor Hartsfield, WSRO conduct facility compliance inspection. The Sherwin-Williams facility appeared to be operating in compliance with all permit requirements.
April 23, 2019	DAQ acknowledges receipt of 502(b)(10) notification from Sherwin-Williams for addition of two 500-gallon portable mix tanks (ID Nos. PM 507 and PM509) – Application No. 4100868.19A.
November 13, 2019	DAQ acknowledges receipt of 502(b)(10) notification from Sherwin-Williams for operation of a bulk tank truck filling area (ID No. FFLbulk) – Application No. 4100868.19B.
February 7, 2020	WSRO issues Notice of Deficiency to Sherwin-Williams for late submittal of quarterly and semi-annual summary reports.
July 14 and 16, 2020	Jim Hafner, WSRO conducts facility compliance inspection. The Sherwin-Williams facility appeared to be operating in compliance with all permit requirements.
August 31, 2020	DAQ receives permit renewal application (No. 4100868.20A) from Sherwin-Williams.
September 1, 2020	WSRO receives application (No. 4100868.20B) from Sherwin-Williams for a minor modification of their permit to add one 2,000-gallon blending tank for the manufacture of UV coatings (ID No. UVT5).

xxx	DAQ sends draft permit to Sherwin-Williams and WSRO for review and comment.
xxx	DAQ receives comments on draft permit from Sherwin-Williams.
xxx	DAQ receives comments on draft permit from WSRO.
xxx	Permit renewal notice published, 30-day public notice and comment period begins, and 45-day EPA comment period begins.
xxx	30-day public notice and comment period ends.
xxx	45-day EPA comment period ends.

4. Permit Modifications and Title V Equipment Editor (TVEE) Discussion

The following table summarizes changes to the Sherwin-Williams permit resulting from the permit renewal:

Page No.	Section	Description of Changes
Cover		• Corrected permittee name to "The Sherwin-Williams Company – Stage Coach Trail • Changed facility street name from Stagecoach Trail to Stage Coach Trail
Cover and throughout	---	• Updated all dates and permit revision numbers • Changed all citations of 15A NCAC 02D to 15A NCAC 02D • Changed all citations of 15A NCAC 02Q to 15A NCAC 02Q
Insignificant Activities List	Attachment	Changed each occurrence of **[GACT, Subpart CCCCCCC]** to **GACT CCCCCCC**
3-5	1	• Changed **I.D.** in table header to **ID** • Added the following sources to table: ID Nos. FFLbulk, UVT5, PM 507 and PM 509
6	2.1 A 2.1 A.1.a	• Added source ID NO. FFLbulk to list of sources • Included both PM allowable emission rate equations in table • Removed 02D .0521 from table Updated section to reflect the most current stipulations for 15A NCAC 02D .0515
6	2.1 A.2	Deleted section – visibility requirements in GACT Subpart CCCCCCC apply
7	2.1 B	• Changed number of blending tanks in list of sources from four to five • Change **UVT4** to **UVT5** all throughout Section 2.1 B (pages 7-9) • Included both PM allowable emission rate equations in table • Removed 02D .0521 from table
8	2.1 B.1.a, d, f 2.1 B.2	Deleted section – visibility requirements in GACT Subpart CCCCCCC apply Updated section to reflect the most current stipulations for 15A NCAC 02D .0515
9	2.2 A.2	Updated section to reflect the most current stipulations for 15A NCAC 02Q .0711

Page No.	Section	Description of Changes
10	2.2 A.3	Updated section to reflect the most current stipulations for 15A NCAC 02D .1100
11	2.2 A.4.b	Updated reference to be used in calculating monthly HAP emissions
	2.2 A.4.c	Inserted "Part" between "40 CFR" and "63.10(b)(3).
	2.2 A.4.d	Updated section to reflect the most current stipulations for avoidance conditions for maximum achievable control technology
	2.2 A.5	Included citation and NESHAP title in section title
	2.2 A.5.a	• Created new paragraph "a" with title "Applicability" for the introductory language to this section • Added source ID No. DSSB1 to list of sources subject to Subpart CCCCCCC • Changed **UVT4** to **UVT5**
	2.2. A.5.b	• Deleted old paragraph "a" with compliance dates • Added NESHAP citation (§63.11601) to section title
12	2.2 A.5.c, d	Deleted initial particulate control device inspection and compliance test requirements, since they have been completed
	2.2 A.5.c, d, e	Added NESHAP citation (§63.11602) to section title
	2.2 A.5.e, f, g	Relettered paragraphs as c, d, and e
	2.2 A.5.d(new)	Changed lettering of paragraphs A. through F. to (A) through (F)
13	2.2 A.5.e(new)	• Deleted initial notification requirements which have been satisfied, and renumbered remainder of paragraph • Added NESHAP citation (§63.11603) to section title
14-25	3	Updated General Conditions to Version 5.5 dated August 25, 2020

The following emission sources were added to the Title V Equipment Editor (TVEE):

- Two 500-gallon portable mix tanks (GACT CCCCCCC) (ID Nos. PM 507 and PM509)
- Bulk tank truck filling (ID No. FFLbulk)
- One 2,000-gallon blending tank (GACT CCCCCCC) (ID No. UVT5)

For the following emissions sources, the designation "[GACT, Subpart CCCCCCC]" in their TVEE descriptions was changed to "[GACT CCCCCCC]"

- One HSD mixer (ID No. IES-RDHSD1)
- One continuous media (COM) mill (ID No. IES-RDCOM1)
- One dual motor Myers (ID No. IES-RDM2)
- One Eiger COM (ID No. IES-QAQCHSD2)
- Three air mixers (ID Nos. IES-RDAM1 through IES-RDAM3)
- Pre-batch weigh station hood (ID No. IES-RMWHH1)
- Six air mixers (ID Nos. IES-DSAM1 through IES-DSAM6)
- Twenty-three air mixers (ID Nos. IES-RDAM4 through IES-RDAM26)

- Three air mixers (ID Nos. IES-QAQCAM1 through IES-QAQCAM3)
- One cartridge-type bagfilter (10,160 square feet of filter area; ID No. CD1) installed on a Bag Baler (ID No. IES-BB1)
- One high speed disperser (HSD) vessel (400 gallon capacity) (ID No. HS11)
- One high speed disperser (HSD) vessel (500 gallon capacity) (ID No. HSD40)
- Four high speed disperser (HSD) vessels (660 gallon capacity) (ID No. HSD1, HSD7, HSD8, and HSD10)
- One high speed disperser (HSD) vessel (1,000 gallon capacity) (ID No. HSD20)
- One high speed disperser (HSD) vessel (1,400 gallon capacity) (ID No. HSD6)
- One thin and shade (T&S) tank (660 gallon capacity) (ID No. T&S9)
- Three thin and shade (T&S) tanks (1,100 gallon capacity) (ID Nos. T&S12, T&S13, and T&S23
- Three thin and shade (T&S) tanks (1,400 gallon capacity) (ID Nos. T&S27, T&S28, and T&S29)
- One thin and shade (T&S) tank (2,000 gallon capacity) (ID No. T&S25)
- Two thin and shade (T&S) tanks (2,200 gallon capacity) (ID Nos. T&S21 and T&S22)
- Six thin and shade (T&S) tanks (3,000 gallon capacity) (ID Nos. T&S15, T&S24, and T&S34 through T&S37)
- Three thin and shade (T&S) tanks (4,000 gallon capacity) (ID No. T&S14, T&S16, and T&S17)
- Two thin and shade (T&S) tanks (5,000 gallon capacity) (ID No. T&S32 and T&S33)
- One thin and shade (T&S) tank (6,500 gallon capacity) (ID No. T&S26)
- Two blending tanks (250 gallon capacity) (ID Nos. UVT1 and UVT2)
- Two blending tanks (500 gallon capacity) (ID Nos. UVT1 and UVT2)
- Portable mixing tank (30 gallon capacity) (ID No. PM31)
- Two portable mixing tanks (80 gallon capacity) (ID Nos. PM81 and PM82)
- Seven portable mixing tanks (100 gallon capacity) (ID Nos. PM101 through PM104, and PM 107 through PM109)
- Two portable mixing tanks (130 gallon capacity) (ID Nos. PM131 and PM 132)
- Five portable mixing tanks (180 gallon capacity) (ID Nos. PM181 through PM185)
- Three portable mixing tanks (250 gallon capacity) (ID Nos. PM251, PM258 and PM259)
- Five portable mixing tanks (300 gallon capacity) (ID Nos. PM301 through PM305)
- Portable mixing tank (350 gallon capacity) (ID No. PM351)
- Portable mix and thin tank (235 gallon capacity) (ID No. PM&TI)
- Two portable mixing tanks (500 gallon capacity) (ID Nos. PM 507 and PM 509)

5. Description of Changes and Estimated Emissions

A. Addition of two 500-gallon portable mix tanks (ID Nos. PM 507 and PM509). These tanks are similar in function to the 27 preexisting portable mixing tanks. These additional tanks will not increase emissions from the facility, because the mixing process is limited by the number of dispersers at the facility, which remains unchanged at 35 (ID Nos. SB-1 through SB-35, 30 horsepower or less each;). These additional tanks do not affect the applicable requirements for the facility and will be controlled by the same bagfilter (ID No. CDUV1) as the other portable mixing tanks. Continued compliance is expected.

B. Addition of bulk tank truck filling (ID No. FFLbulk). This change adds another location at the facility for filling operations, namely filling trucks with product outside the north end of the main building. This additional location does not reflect an increase in emissions at the facility. The emissions from bulk tank truck filling have already been accounted for; they are emissions that would have otherwise occurred at other filling operations at the facility. This new filling location

does not affect the applicable requirements for the facility, and like other filling operations at the facility is not controlled. Continued compliance is expected.

C. Addition of one 2,000-gallon blending tank (ID No. UVT5). This new blending tank will be used to blend ultraviolet (UV) light curable coatings, along with four existing UV blending tanks. Sherwin-Williams expects to operate the tank 24 hours per day, seven days per week, with an estimated throughput of 730,000 gallons per year. The tank will be vented to an existing bagfilter (ID No. CDUV1) with 3,000 square feet of filter area.

Emissions from the blending tank (ID No. UVT5) include particulate matter less than 2.5 microns in diameter (PM2.5), volatile organic compounds (VOC), hazardous air pollutants (HAP) and North Carolina toxic air pollutants (TAP). The following table lists expected annual emissions of these pollutants.

Pollutant Classification	Pollutant	Blending Tank		Plant-Wide	
		Expected Actual (after control)	Potential (before control)	Expected Actual (after control)	Potential (before control)
Criteria Pollutants	PM2.5	0.12	11.8	0.82	114.7
	VOC	4.09	4.09	115.46	161.64
HAP	Ethylbenzene	0.30	0.30	0.69	1.06
	Methyl isobutyl ketone	0.14	0.14	1.07	1.65
	Toluene	0.68	0.68	5.45	8.41
	Xylene	0.78	0.78	3.21	4.96
TAP	Methyl ethyl ketone	0.0088	0.0088		
	Ethyl acetate	0.2057	0.2057	1.23	

As shown above, the additional emissions from the blending tank are minimal when compared to the overall plant-wide emissions. The major source thresholds for neither criteria nor hazardous air pollutants are approached as a result of the new blending tank.

The emissions from the facility were estimated using Sherwin-Williams's Air Pollutant Emissions Module, or APEM[1], which documents the methods Sherwin-Williams uses to estimate emissions from their paint and coatings manufacturing processes. The methods in the APEM are used to develop Sherwin-Williams' annual emissions inventory and are consistent with those described in the U.S. EPA recommended document "Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities"[2]. The APEM is also referenced in Section 2.2 A.4.b of the Sherwin-Williams permit.

Continued compliance is expected.

6. Regulatory Review

The Sherwin-Williams facility is subject to the following regulations:

- 02D .0515, Particulates from Miscellaneous Industrial Processes

[1] Also known as the Air Pollutant Emission Methodologies (APEM) Technical Support Document (Sherman-Williams, March 2020)
[2] Document issued by the Emission Inventory Improvement Program (EIIP, February 2005)

- 02D .0521, Control of Visible Emissions
- 02D .1100, Control of Toxic Air Pollutants (State enforceable only)
- 02D .1111, Generally Achievable Control Technology
- 02D .1806: Control and Prohibition of Odorous Emissions (State enforceable only)
- 02Q .0317: Avoidance Conditions (for 02D .1111, Maximum Achievable Control Technology)
- 02Q .0711: Emission Rates Requiring a Permit (State enforceable only)

02D .0521 states that "sources subject to a visible emission standard in Rules . . . .1111, . . . of this Subchapter shall meet that standard instead of the standard contained in this Rule. The Sherwin-Williams facility is subject to the visible emission requirements in 40 CFR 63, Subpart CCCCCCC, National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing, which are actually more protective of the environment than the visible emission requirements under 02D .0521. For these reasons, the 02D .0521 visible emission requirements have been removed from the permit.

The facility has not become subject to any additional regulations as a result of this renewal and minor modification. The permit has been updated to reflect the most current stipulations for all applicable regulations. Continued compliance is expected.

7. National Emission Standards for Hazardous Air Pollutants (NESHAPS): Maximum and/or Generally Achievable Control Technology (MACT/GACT)

The following sources at the facility are subject to 40 CFR 63, Subpart CCCCCCC, National Emission Standards for Hazardous Air Pollutants for Area Sources: Paints and Allied Products Manufacturing.

- Eight high speed disperser vessels (ID Nos. HSD1, HSD6, HSD7, HSD8, HSD10, HSD11, HSD20, and HSD40)
- Twenty-two thin and shade tanks (ID Nos. T&S9, T&S12 through T&S17, T&S21 through T&S29, and T&S 32 through T&S37)
- Five UV light curable paint manufacturing operations and processes (ID Nos. UVT1 through UVT5)
- Twenty-eight portable mixing tanks with thirty-five dispersers, 30 horsepower or less each (ID Nos. PM31, PM81, PM82, PM101 through PM104, PM107 through PM109, PM131, PM132, PM181 through PM185, PM251, PM258, PM259, PM301 through PM305, PM351, and PM&T1)

The facility has not become subject to any additional MACT or GACT standards as a result of this renewal and minor modification. Continued compliance with 40 CFR 63, Subpart CCCCCCC is expected.

8. New Source Performance Standards (NSPS)

The Sherwin-Williams facility is not currently subject to any NSPS. This permit renewal with minor modification does not affect this status.

9. New Source Review (NSR)/Prevention of Significant Deterioration (PSD)

The Sherwin-Williams facility is not currently subject to any NSR or PSD requirements. This permit renewal with minor modification does not affect this status.

10. Risk Management Plan Requirements

40 CFR Part 68 requires stationary sources storing more than threshold quantities of regulated substances to develop a risk management plan (RMP), in accordance with Section 112(r) of the Clean Air Act. The RMP lists the potential effects of a chemical accident at the facility, steps the facility is taking to prevent an accident, and emergency response procedures to be followed if an accident should occur.

Sherwin-Williams is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule. This permit renewal with minor modification does not affect the 112(r) status of the facility.

10. Compliance Assurance Monitoring (CAM)

Under 40 CFR Part 64, a facility must develop a continuous CAM plan for any pollutant specific unit meeting all of the following criteria:

- It is located at a major source required to obtain a 40 CFR Part 70 or Part 71 permit;
- It is subject to an emission limitation or standard for a regulated air pollutant (and that standard is not exempt under 40 CFR 64.2(a)(1)(b));
- It uses an active control device to comply with that emission limitation or standard; and
- It has a potential pre-control emission rate that equals or exceeds the major source threshold for criteria pollutants or HAPs.

CAM was determined in a preceding permit review to not be applicable because potential pre-controlled emissions (particulate) were less than CAM thresholds. The permit renewal with minor modification does not affect the facility's status with respect to CAM). Continued compliance is expected.

11. Facility-wide Toxics Review

Sherwin-Williams is subject to emission limits for methyl ethyl ketone in accordance with 15A NCAC 02D .1100, "Control of Toxic Air Pollutants". The following emission limits were established as a facility-wide worst-case single stack modeling demonstration reviewed and approved by the AQAB on March 3, 2002.

Emission Source(s)	Toxic Air Pollutant(s) (CAS Number)	Emission Limit(s) (pounds per day)
Dust collector **(ID No. CD1)**	Methyl ethyl ketone (78-93-3)	104.4
Ventilation fan		18.1
Puffer vent		16.7
Still vent		51.8
Solvent tank **(ID No. ST21)**		0.8
Solvent tank **(ID No. ST6)**		1.1
Solvent tank **(ID No. ST2)**		3.5
Solvent tank **(ID No. ST7)**		1.0

To ensure compliance with these limits, Sherwin-Williams is required to not exceed a production rate of 65,000 gallons of coating material per day. Within 30 days after each calendar year quarter, Sherwin-Williams is required to report a summary of the highest single day production rate value, provided the value does not exceed 65,000 gallons. If the highest value exceeds 65,000 gallons, the facility shall report all daily production rates for the entire calendar year quarter. This permit renewal with minor modification does not affect this status.

In addition, the Sherwin-Williams permit lists several NC toxic air pollutants (TAPs) and their respective toxic permit emission rates (TPERs) as established in 15A NCAC 02Q .0711, "Emission Rates Requiring a Permit".

Pollutant (CAS Number)	TPERs Limitations			
	Carcinogens (lbs/yr)	Chronic Toxicants (lbs/day)	Acute Systemic Toxicants (lbs/hr)	Acute Irritants (lbs/hr)
Ammonia (7664-41-7)				0.68
Chlorobenzene (108-90-7)		46		
Cresol (1319-77-3)			0.56	
Ethyl Acetate (141-78-6)			36	
Formaldehyde (50-00-0)				0.04
Methyl isobutyl ketone (108-10-1)		52		7.6
Phenol (108-95-2)			0.24	
Toluene (108-88-3)		98		14.4
Xylene (1330-20-7)		57		16.4

The following table displays facility-wide emission estimates for TAPs emitted from the Sherwin-Williams facility, including emissions from the new blending tank discussed in Section 5.C of this review. As shown, TAP emissions from the facility are well below the TPERs limitations in 15A NCAC 02Q .0711. Furthermore, facility-wide emissions for methyl ethyl ketone are less than the emission limits established above under 02D .1100 as a facility-wide worst-case single stack modeling demonstration.

Pollutant (CAS Number)	TAP Emissions Facility-wide	
	lbs/day	lbs/hr
Methyl ethyl ketone	154.0	6.42
Ethyl Acetate (141-78-6)		0.282
Formaldehyde (50-00-0)		0.020
Methyl isobutyl ketone (108-10-1)		0.378
Toluene (108-88-3)	46.1	1.92
Xylene (1330-20-7)	27.2	1.13

The Sherwin-Williams permit requires the facility to be operated and maintained so that emissions of any listed TAPs from the facility, including fugitive emissions, will not exceed the TPERs; and to maintain records that demonstrate compliance with each TPER. Based on the most recent inspection, Sherwin-Williams has been complying with this regulation. Continued compliance is expected.

12. Facility Emissions Review

The table in the header page of this review summarizes air pollutant emissions Sherwin-Williams has reported in the annual emissions inventories for the years 2014 through 2018 after application of required emission controls. The data indicate an increase in VOCs from 78.23 tons in 2014 to 106.85 tons in 2018. In addition, HAP emissions have increased over the same time period to from 11.67 tons to 15.54 tons, with toluene being the largest single HAP emitted from the facility.

13. Compliance Status

The Sherwin-Williams facility was last inspected on July 14 and 16, 2020 by Jim Hafner of the WSRO. The company appeared to be in compliance with all applicable requirements at that time.

On February 7, 2020, the WSRO issued a Notice of Deficiency to Sherwin-Williams for failure to submit quarterly and semi-annual summary reports by their due date.

14. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. Virginia is an affected state within 50 miles of the facility, and the Forsyth County Office of Environmental Assistance and Protection is an affected local program.

15. Other Regulatory Considerations

The following items were not required in Permit Application No. 4100868.20A:

- Professional Engineer's seal
- Zoning consistency determination
- Permit fee.

Sherwin-Williams did submit a $988 fee to DAQ on September 1, 2020 for a minor modification to their facility—the addition of a 2,000-gallon blending tank (ID No. UVT5).

16. Recommendations

DAQ has reviewed the permit application(s) for The Sherwin-Williams Company - Stage Coach Trail located in Greensboro, Guilford, County to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 05755T22.